

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

LEN STOLER, INC. d/b/a LEN STOLER )  
AUDI, )  
 )  
Plaintiff/Counter-Defendant, )  
 ) Case No. 1:15CV1659-TSE/JFA  
v. )  
 )  
VOLKSWAGEN GROUP OF AMERICA, INC. )  
d/b/a AUDI OF AMERICA, INC., )  
 )  
Defendant/Counter-Plaintiff. )

**NOTICE OF MOTION TO FILE UNDER SEAL**

Defendant Volkswagen Group of America, Inc. d/b/a Audi of America, Inc. (“AoA”) has filed a Motion to File Under Seal allowing the filing under seal of certain information set forth in AoA’s Response to Stoler’s Supplemental Statement of Material Facts That Should Be Undisputed (Dkt. No. 81). Any party who objects to the proposed filing and redactions under seal may file an objection within seven (7) days of today, and all or part of such objection and supporting memoranda will be treated as confidential if designated as such by the person objecting until the Court rules on the Motion to File Under Seal. If no timely objection is filed, the Court may treat the Motion to File Under Seal as uncontested.

Dated: October 12, 2016

Respectfully submitted,

/s/Richard Mark Dare  
Richard Mark Dare (VSB No. 14146)  
ISLERDARE PC  
1945 Old Gallows road, Suite 650  
Tysons Corner  
Vienna, Virginia 22182  
T: (703) 748-2690  
F: (703) 748-2695  
mdare@islerdare.com

/s/James R. Vogler

James R. Vogler (admitted *pro hac vice*)  
Daniel R. Fine (admitted *pro hac vice*)  
Jack O. Snyder, Jr. (admitted *pro hac vice*)  
Emily L. Gesmundo (admitted *pro hac vice*)  
BARAK FERRAZZANO  
KIRSCHBAUM & NAGELBERG LLP  
200 West Madison Street, Suite 3900  
Chicago, Illinois 60606  
T: (312) 984-3100  
F: (312) 984-3150  
[Jim.volger@bfkn.com](mailto:Jim.volger@bfkn.com)  
[Dan.fine@bfkn.com](mailto:Dan.fine@bfkn.com)  
[Jack.snyder@bfkn.com](mailto:Jack.snyder@bfkn.com)  
[Emily.Gesmundo@bfkn.com](mailto:Emily.Gesmundo@bfkn.com)

*Counsel for Defendant*  
*Volkswagen Group of America*  
*d/b/a Audi of America, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of October, 2016, I served a true and accurate copy of the foregoing by filing it electronically with the Clerk of the Court using CM/ECF system, which will send a notification of such filing (NEF) to the following:

Barbara S. Wahl, Esq.  
Arent Fox LLP  
1717 K Street, N.W.  
Washington, DC 20006  
[Barbara.wahl@arentfox.com](mailto:Barbara.wahl@arentfox.com)

Russell P. McRory, Esq.  
Arent Fox LLP  
1675 Broadway  
New York, NY 10019  
[Russell.mcrory@arentfox.com](mailto:Russell.mcrory@arentfox.com)

Sean Nicholas Clerget, Esq.  
Arent Fox LLP  
1717 K Street NW  
Washington, DC 20036-5344  
[sean.clerget@arentfox.com](mailto:sean.clerget@arentfox.com)

---

/s/  
R. Mark Dare, Va. Bar No. 14146  
ISLERDARE PC  
1945 Old Gallows Road, Suite 650  
Vienna, VA 22182  
(703) 748-2690  
(703) 748-2695 (fax)  
[mdare@islerdare.com](mailto:mdare@islerdare.com)  
*Counsel for Defendant*  
*Volkswagen Group of America, Inc.*  
*d/b/a Audi of America, Inc.*